

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

Case No. 2:18-cv-01247-JFC

GUIDECRAFT, INC.,

Plaintiff,

v.

OJCOMMERCE, LLC, a Delaware  
corporation; OJCOMMERCE.COM, INC.,  
a Delaware corporation; NAOMI HOME,  
Inc., a Delaware corporation; and  
JACOB WEISS, an individual

Defendants.

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**UNCONTESTED MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE  
TO PLAINTIFF'S AMENDED COMPLAINT**

Defendants, in accordance with Fed. R. Civ. 6(b), move for a 20 day extension of time to file their response to Plaintiff's Amended Complaint (DE 26). Defendant has agreed to the relief sought herein.

1. On September 19, 2018, Plaintiff filed its amended complaint.
2. On November 20, 2018, Defendants moved to dismiss this case for lack of jurisdiction, improper venue, and numerous pleading deficiencies. In response, Plaintiff filed an amended complaint on December 11, 2018.
3. Defendants' response to Plaintiff's amended complaint was due on December 26, 2018. But due to an oversight by staff in Counsel's office, the deadline to respond to Plaintiff's amended complaint was calendared as January 2, 2019, instead of December 26, 2018.
4. Federal Rule of Civil Procedure 6(b) provides that the Court may provide an extension of time for good cause.

5. In addition to the error above, due to the holiday season, key team members assisting with this matter have been, and will be, out of the office. Given this setback, Defendants request an additional 20 days to file their response to Plaintiff's amended complaint. This extension is necessary because prior commitments of counsel, both professional and personal, ensure that the only way for Defendants to meet an earlier deadline would be to involve additional counsel unfamiliar with the facts and legal issues in this matter, which would prejudice Defendants.

6. The extension is early in the case, will not prejudice Plaintiff, and is the first extension Defendants are seeking.

7. Counsel for Plaintiff has graciously agreed to this request.

WHEREFORE, Defendants requests a 20-day extension of time to file their response to Plaintiff's amended complaint, up to and including January 15, 2019.

Dated December 27, 2018

Respectfully submitted,

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*Counsel for Plaintiff, OJ Commerce LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed on December 27, 2018 with the Clerk of Court using CM/ECF which caused a copy to be served on all counsel of record.

*s/ Velvel (Devin) Freedman*

Velvel (Devin) Freedman